



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

TDD 217/782-9143

APR 19 2017

Certified Mail #7014 2120 0002 3290 8265
Return Receipt Requested

Jim Pritchett
Honeywell International Inc.
P.O. Box 430
US Highway 45 N
Metropolis, Illinois 62960

**RE: Violation Notice A-2017-00018
I.D. 127854AAD**

Dear Mr. Pritchett:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this letter. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the source wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the source wishes to enter into a CCA, the written response must also include proposed terms for the CCA that contains dates for achieving each commitment and may also include a statement that compliance has been achieved for some or all of the alleged violations. In order to increase the likelihood of the Illinois EPA accepting such terms, the written response should specifically propose them in a manner that can be formalized into an enforceable agreement between the Illinois EPA and the source. As such, proposed conditions should be as detailed as possible, including steps to be taken to achieve compliance, the manner of compliance, interim and completion dates, etc.

The Illinois EPA will review the proposed terms for a CCA provided by the source and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the source must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the source rejects the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to the prosecutorial authority.

Written communications should be directed to Ken Erewele, Illinois EPA, Bureau of Air, Compliance Unit, P.O. Box 19276, Springfield, Illinois 62794-9276. All communications must **include reference to the Violation Notice number in this matter.**

Questions regarding this matter should be directed to Ken Erewele at 217/782-0421, or the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Yasmine Keppner-Bauman', is written over the typed name.

Yasmine Keppner-Bauman, Acting Manager
Compliance Section
Bureau of Air

YKB:KE

ATTACHMENT A

Based on available information:

VIOLATIONS:

1. Sections 9(a) and 39.5(6)(a) of the Act, 35 Ill. Adm. Code 201.141, and conditions 2.1.a., 2.1.c, 4.6.2.a.i., and 4.6.2.b.i.A of Clean Air Permit Program ("CAAPP") permit 96030014: Honeywell International Inc., caused or allowed the emission of hydrogen fluoride ("HF") into the environment, on February 15, 2017, generated during HF scrubber operations in excess 0.38 lbs/hr from the A, B and C cells at the Gaseous Fluoride Building ("GF2"), resulting, in part, from an insufficient quantity of scrubbant in the system.
2. Section 39.5(6)(a) of the Act, and conditions 2.1.a. and 4.6.2.c.i.A. contained within CAAPP permit 96030014: Honeywell International Inc. failed to follow good operating practices for each Fluorine Plant scrubber, including routine maintenance, in a manner consistent with good air pollution control practice.

RECOMMENDATIONS:

The Illinois EPA suggests that Honeywell International Inc. take the following actions to address the violations stated above:

Within 45 days of receipt of this Violation Notice, develop, implement, and submit to the Illinois EPA, Bureau of Air, Compliance Section, Attn: Ken Erewele, a compliance plan which ensures compliance with HF emission limitations from the A, B and C cells and the associated scrubbers. The plan shall include all interim and permanent measures and procedures that have been undertaken, or that will be undertaken, necessary milestones, and dates by which those milestones will be achieved, to prevent future non-compliance.